EXHIBIT A

## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

ACE AMERICAN INSURANCE	§	
COMPANY,	§	
Plaintiff,	§ § 8	
vs.	<b>§</b>	No. 1:22-cv-4053
	§	
H&K INTERNATIONAL, INC. f/k/a	§	
H&K DALLAS, INC., BRS INSURANCE	§	
COMPANY, AND MCDONALD'S	§	
CORPORATION,	§	
	§	
Defendants.	§	

## JUSTIN K. RATLEY'S DECLARATION IN SUPPORT OF DEFENDANT H&K INTERNATIONAL, INC. F/K/A H&K DALLAS, INC.'S MOTION TO DISMISS AND FOR ABSTENTION

- 1. I am over the age of eighteen, a citizen of the United States of America, and if called upon, I would competently testify to the matters set forth herein from my own personal knowledge.
- 2. I am a shareholder with the law firm of Munsch Hardt Kopf & Harr, P.C. ("MHKH"), which maintains offices at 700 Milam Street, Suite 800, Houston, Texas 77002. I am licensed to practice law in the State of Texas and am admitted to the General Bar in the United States District Court for the Northern District of Illinois to practice law in Illinois in connection with the above-captioned case, No. 1:22-cv-4053; ACE American Insurance Company v. H&K International, Inc. f/k/a H&K Dallas, Inc., BRS Insurance Company, and McDonald's Corporation, in the United State District Court for the Northern District of Illinois, Eastern Division.

- 3. This Declaration is made in good faith and in support of Defendant H&K International, Inc. f/k/a H&K Dallas, Inc.'s *Motion to Dismiss and for Abstention* pursuant to FEDERAL RULES OF CIVIL PROCEDURE 12(b)(1), 12(b)(2), and 12(b)(6) ("Defendant's Motion").
- 4. Attached to Defendant's Motion as Exhibit A-1 is a true and correct copy of H&K International, Inc.'s Original Petition in Cause No. DC-22-09632; styled as *HKI International, Inc.* v. F&M Installations Corp., H&S Installations, Corp., Selective Insurance Company of America, ACE American Insurance Company, and KGK Management, Inc., in the 14<sup>th</sup> Judicial District of Dallas County, Texas.
- 5. Attached to Defendant's Motion as Exhibit A-2 is a true and correct copy of Chubb North America's Claim Director's, Dominic Vari, November 2, 2021 correspondence to me.
- 6. Attached to Defendant's Motion as Exhibit A-3 is a true and correct copy of my June 8, 2021 correspondence to Dominic Vari, Chubb North America's Claim Director.
- 7. Attached to Defendant's Motion as Exhibit A-4 is a true and correct copy of Chubb North America's August 4, 2022 correspondence to me, on behalf of HKI.
- 8. Attached to Defendant's Motion as Exhibit A-5 is a true and correct copy of HKI's Amendment to Registration of Entity Information.
- 9. Attached to Defendant's Motion as Exhibit A-6 is a true and correct copy of HKI's Texas Franchise Tax Public Information Report."

I, Justin K. Ratley, declare under penalty of perjury and pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct. Executed on August 24, 2022.

Justin K. Ratley